processing on the due date. My reasoning for this is that the only real

difference between a completely electronic order and one that requires manual

intervention is the amount of time required to enter the order into Ameritech

downstream service order systems. Once the orders are in these system, there is

no difference in downstream processing. If the difference in time at the order

entry stage would cause the due date to change more often than it does on

electronically processed orders, then one could claim that manual intervention

does affect the ability to meet due dates. My experience is that in practice

there is no difference.

Q.   Do you agree with the assertions of Mr. Connolly and Ms. Wiecki that the
       frequency with which orders are processed manually should be of concern
       to this Commission?

A.   No. Whether Ameritech uses a model T Ford or a Cray super computer to

       respond to all orders, reflective of whatever reasonable business judgments

       Ameritech makes, should be of no concern either to our competitors or to the

       Commission. What Ameritech is obliged to do is to meet whatever deadlines

       we give ourselves and our customers and to do so in a way which provides

       CLECs the comparable level of service commitment and performance that is

       provided to Ameritech's retail operations. From my business "bottom line"

       stand point, if Ameritech fails to meet these obligations, whether the failure is

       attributable to "manual processing" or to "electronic processing" will not be the

point, and Ameritech properly will be subject to complaints from both CLECs

as well as the Commission in either event.

Q.   What about Mr. Connolly's example of how an order due date would be
      changed because of manual intervention?

A.   The example that Mr. Connolly gave was not representative of how the OSS

      interfaces work. The only due dates that "close" are for those orders that

      require an Ameritech field technician visit. Using the pre-ordering interface,

      the CLEC has the ability to schedule a due date for these type of orders and

      manual intervention has no effect upon the date scheduled.

Q.   Is the frequency of manual intervention in the processing of orders to which
      Mr. Connolly and Ms. Wiecki refer in their testimony an accurate
      description of current capacity or future performance?

A.   No. Since AT&T entered the local exchange market in Michigan, its

      percentage of orders not requiring manual intervention has averaged 76%. The

      greatest percentage of orders process electronically for a given day was 85%

      and that occurred on the day the order volume for AT&T also peaked. Of the

      orders requiring manual intervention, most required manual intervention

      because the order was for less than all of a multi-line account or because

      multiple accounts were being combined on a single order.

Q.   Is manual intervention in approximately 24% of all orders an acceptable
      ratio?

A.   That depends on the particular circumstance of interface use.   In a similar

system my team developed for voice mail,   17% of the 23,000 orders processed

monthly require manual intervention.   After having the system in production

over a year and mechanizing those orders that made up the most volume and

were adaptable to mechanization, we felt that 83% was the optimal

mechanization rate for that interface.   We continue to periodically review the

orders requiring manual intervention to determine if further mechanization is

practical.   We plan to duplicate this effort on the OSS ordering interfaces.   I

would never expect Ameritech to handle 100% of all orders without some level

of human intervention at some stage in the process.

Q.   **What is the current status of Ameritech's order provisioning interface?**

A.   While no specific tests were performed on provisioning alone, except the

jeopardy notification interface, all ordering, testing, and production ordering

functions have a provisioning component.   AT&T itself, for example, is

receiving electronic order confirmation and order completion notifications from

Ameritech on all orders it places.   The only electronic interface functionality not

presently used in the marketplace is the jeopardy notification provisioning

function and the maintenance function.   These interface functions are available

but to date no requesting carrier is making use of them.

Q.   Can you comment upon Mr. Connolly's characterization of the costs to be incurred by CLECs in putting themselves into position to interface with Ameritech's OSS functions?

A.   Yes, I believe I can. Ameritech's response to the questions asked of it by PSC staff was limited, as were the questions themselves, to the cost of developing the interface. Ameritech is not in a position to, and is therefore reluctant to, express an opinion on the total cost to a CLEC of developing the business and electronic infrastructure necessary to put a CLEC in position to make commercial use of that interface.

Q.   Does this conclude your rebuttal testimony?

A.   Yes.

1   MR. DAWSON: Thank you. One brief

2   question before tendering the witness.

3   Further Direct Examination

4   By Mr. Dawson:

5   Q.   We looked at this morning the surrebuttal

6   testimony filed on behalf of MCI witness Ali

7   Miller. Have you had a chance to review that

8   briefly, Mr. Rogers?

9   A.   Just briefly.

10   Q.   With respect particularly to testimony in this

11   surrebuttal on page 6, do you have it in front of

12   you?

13   A.   No, I don't.

14   Q.   I'll hand it to you. Handing you what's a copy of

15   that surrebuttal testimony, as you look at page

16   6.

17   A.   Okay.

18   Q.   You see testimony there about responding to

19   questions concerning national standards for

20   interfaces?

21   A.   Yes, I do.

22   Q.   What version does Ameritech sponsor at this time?

23   A.   I'm sorry, Counsel. I don't --

24   Q.   Of the five listed interfaces here.

25   A.   We sponsor the EDI via TCP/IP which is the GEIS

1   information system solution.

2 Q.   Is that materially different from the first one

3   listed there, EDI via TCP/IP?

4 A.   The solution that we have from GEIS is an EDI over

5   TCP/IP. The difference is the EAP is just a

6   mechanism for logging into the system and sending

7   the underlying EDI transactions. It is an EDI via

8   TCP/IP, so I'm not familiar with what's the

9   difference between the GTE proposal and the one

10   that we have from GE Information Systems.

11 Q.   Are you aware of any differences?

12 A.   No, I'm not.

13   MR. DAWSON: The witness is available

14   for cross-examination.

15   MS. MARSH: Joan Marsh appearing on

16   behalf of AT&T. If it's okay with Your Honor,

17   we'll go first. I think the parties have all

18   agreed with that.

19   EXAMINER JAMES: That's fine.

20   Cross-Examination

21 By Ms. Marsh.

22 Q.   Good morning, Mr. Rogers.

23 A.   Good morning.

24 Q.   Could you please tell the panel your title?

25 A.   I am director of information technology for

1   Ameritech Information and Industry Services.

2   Q. . And how is Ameritech Information Industry Services

3   related to Ameritech Corporation?

4   A.   We are one of the two wholesale business units

5   within Ameritech.

6   Q.   What are your duties and responsibilities at

7   Ameritech Information Industry Services?

8   A.   I am responsible for all the IT requirements of

9   their business unit which includes system

10   development, computers, end-user computing.

11   Q.   Do your responsibilities include supervision of

12   the systems that Ameritech is making available in

13   connection with its OSS obligations under the

14   Telecommunications Act?

15   A.   I do have responsibility for the systems, yes.

16   But as far as direct supervision of all the

17   systems, I do not have that. I have the

18   responsibility for it, but I do not directly

19   supervise everybody who works on all the systems.

20   Q.   Am I to understand ultimately it is your

21   responsibility to insure that Ameritech is meeting

22   its OSS obligations under the Telecommunications

23   Act?

24   A.   From a system perspective, yes.

25   Q.   Do you have direct responsibility for Ameritech's

1   MORTEL, M-O-R-T-E-L, system?

2   A.   Yes, I do.

3   EXAMINER JAMES: Could we go off the

4   record for a minute?

5   (Discussion off the record.)

6   EXAMINER JAMES: Back on.

7   BY MS. MARSH:

8   Q.   Mr. Rogers, can you explain to the panel what the

9   MORTEL system is and the role that it plays in the

10   delivery of operation support to CLECs?

11 A.   It is EDI interface that accepts orders for resale

12   and unbundled local switching, lines, ports, and

13   it also provides an administrative tool in the

14   service center for Ameritech service reps to

15   service the CLECs as the order is processed.

16 Q.   And if I understand the systems correctly, all

17   orders that are transmitted electronically to

18   Ameritech pass through the MORTEL system on their

19   way to underlying systems; is that correct?

20 A.   All the EDI orders. The ASR orders, the orders

21   that come in through the ASR or access service

22   request do not. The EDI do.

23 Q.   What responsibilities do you have for the

24   underlying operation support systems?

25 A.   The systems that the MORTEL would feed into?

1   Q.   Correct.

2   A.   I have indirect responsibility for them with

3   myself and my peers in the other business units

4   that manage them.

5   Q.   Are those the systems that would support the

6   various functions that a CLEC would rely on in

7   providing local service?

8   A.   Yes.

9   Q.   And for purposes of your testimony today can we

10   refer to those systems as the Legacy systems?

11 A.   Yes, we can.

12 Q.   Can you tell the panel approximately how many

13   different systems are in that family of Legacy

14   systems?

15 A.   Somewhere around 70, 72, 74. I don't know the

16   exact number.

17 Q.   Of those 74 systems, how many systems would a CLEC

18   or a CLEC transaction interact with for the

19   purposes of providing local service?

20 A.   I'm sorry, Counsel, I don't understand. CLEC

21   would always interact with the interfaces that we

22   provide. And those interfaces would interact with

23   the back-end systems. So you're asking how many

24   of those systems they would interact with?

25 Q.   Let me try it again. Of the various types of

1	transactions that a CLEC would submit to
2	Ameritech, how many of those systems would
3	actually process those transactions?
4	A. All of them at one time or another would be
5	involved.
6	Q. What I'd like to do is discuss the various systems
7	by function one at a time starting with the
8	preordering functions if we could.
9	A. Okay.
10	MS. MARSH: May I approach the witness
11	with an exhibit?
12	EXAMINER JAMES: Yes
13	(Exhibit 3 marked.)
14	BY MS. MARSH:
15	Q. Mr. Rogers, do you recognize what we have marked
16	as Exhibit No. 3?
17	A. Yes, I do.
18	Q. Did you assist in the preparation of this
19	document?
20	A. I did not directly assist. I was asked a few
21	questions, I believe some of the answers may be in
22	here, and I also wanted, the exhibits of the
23	exhibit were some slides taken from a presentation
24	that I had provided.
25	Q. Have you reviewed the contents of Exhibit No. 3?

1   A. During deposition on Monday, yes.

2   Q. Can you verify the accuracy of the information

3   provided therein?

4   MR. DAWSON: Well, Your Honor, I will

5   object to asking this witness to verify the

6   accuracy of a multi-page document unless he read

7   every word in it. And as he testified earlier

8   this week, he has not.

9   MS. MARSH: We can try to approach it a

10   page at a time or a relevant part at a time if

11   that's easier, Your Honor.

12   EXAMINER JAMES: Yes, I suppose we

13   could.

14 BY MS. MARSH:

15 Q. Returning to the preordering functions that

16   Ameritech is making available to CLECs, as I

17   understand it Ameritech has indicated in this

18   docket that it's making available on an electronic

19   basis interfaces to support five different

20   functions of preordering; is that correct?

21 A. That is correct.

22 Q. Two of those are done through a file transfer

23   process; is that correct?

24 A. That is correct.

25 Q. And in that process does the process include

1   Ameritech providing or downloading a group of data

2   to the CLECs and they access that at their own

3   premises?

4 A. We provide the data so that they can download it.

5   So we provide the data, updated daily, that would

6   be the feature address file and the -- excuse me,

7   the street address file and feature availability

8   file. It's updated daily, and it's made

9   accessible so they can download it, but we don't

10   download it.

11 Q. I want to focus on the other three functions that

12   require interaction with Ameritech, and that would

13   be due date selection, telephone number

14   reservation and access to customer service

15   records.

16 A. Okay.

17 Q. Can you tell me is any CLEC currently interacting

18   with Ameritech on an automatic basis to select due

19   dates?

20 A. Not to my knowledge.

21 Q. Is any CLEC currently interacting with Ameritech

22   on an automated basis to select telephone numbers?

23 A. That one I'm not sure of, Counsel.

24 Q. Is any CLEC currently interacting with Ameritech

25   on an automated basis to access customer service

1   records?

2   A.   Yes, they are.

3   Q.   And which CLECs is that?

4   A.   USN Communications.

5   Q.   Anybody else besides USN?

6   A.   No, I do not believe so.

7   Q.   As to -- let's turn to Exhibit 3, Exhibit 10 of

8   Exhibit 3 which is entitled operation support

9   systems functionality by interface.

10   A.   I'm sorry, I can't see where the first page

11   begins. The xeroxing is kind of bad. Can I see

12   the first page? Okay.

13   EXAMINER JAMES: Can we go off the

14   record?

15   (Discussion off the record.)

16   BY MS. MARSH:

17   Q.   Let me try to proceed, Mr. Rogers, without

18   requiring you to read the numbers that are on

19   Exhibit 10. As I understand it to the extent that

20   Ameritech is providing volume information to the

21   commission as it relates to preordering interface,

22   those volumes would relate entirely to USN's use

23   of the interface to access customer service

24   records; is that correct?

25   A.   For the preordering interface?

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1   Q.   Correct.

2   A.   For those three functions, yes, I believe that

3   you're correct.

4   Q.   Now, to the best of your knowledge is USN able in

5   every instance to access a customer service record

6   while a customer is on the line?

7   A.   They have the ability to do that, yes.

8   Q.   To your -- the best of your knowledge does USN

9   actually access customer service records in every

10   instance while the customer is on the line?

11   A.   I do know of some cases where they do it when the

12   customer is not on the line. I observed one, but

13   I'm not sure what their business process is of

14   when they do it on line or when they would do it

15   off line.

16   Q.   Can you describe the circumstances under which USN

17   does not access the customer service record while

18   the customer is on the line?

19   MR. DAWSON: You mean the one time he

20   observed it?

21   MS. MARSH: Circumstance that he's aware

22   of, yes.

23   MR. DAWSON: One time.

24   THE WITNESS: Well, I asked to see how

25   the system, their system worked because their

1   system interacts with us, and they provided me a

2   demo where they process an order using the

3   interface. And it was an order that they had. So

4   they -- it was one that they held up for me. So I

5   don't know if they usually do it, use that process

6   or if they use a process where they do it on

7   line.

8 BY MS. MARSH:

9 Q.   Do you know if the volume information that was

10   provided to the commission is volume information

11   as it relates to access while a customer is on the

12   line or access at some other time when the

13   customer is not on the line?

14 A.   Counsel, we have no way of knowing which way it

15   was.

16 Q.   Now, how does USN acquire a telephone number for a

17   new customer?

18 A.   I believe right now they do it through a manual

19   process. They call the service center.

20 Q.   And does that require a USN representative to pick

21   up the phone to call the service center?

22 A.   Yes.

23 Q.   And how does USN currently provide a customer with

24   a due date?

25 A.   In those cases where the due date is required

1   which would be a new line, they do it through the

2   same process, call the service center to get that

3   date.

4 Q.   Now, when an Ameritech retail representative is

5   talking to a customer on the line, are they able

6   to while the customer is on the line provide that

7   customer with a new telephone number for a new

8   service?

9 A.   Do they have the ability, yes, they do.

10 Q.   And is that Ameritech's practice in their retail

11   operation to do that?

12 A.   From my experience I believe they do in a lot of

13   cases do that. But I can't say it's in all cases

14   they do that.

15 Q.   All right. Are Ameritech retail service

16   representatives able to provide a customer with a

17   due date for the installation while the customer

18   is on the line?

19 A.   In some circumstances if it's for a limited number

20   of lines, a limited number of services, they can

21   do it with the same level of support that is

22   provided on the interface. I believe it's five

23   lines or less, anything more than that it's a

24   manual process.

25 Q.   And are Ameritech retail service representatives

1		able to access customer service records while the
2		customer is on the line?
3	A.	I believe they can, yes.
4	Q.	In providing your testimony here today, did you do
5		any analysis of the response time, average
6		response time for USN inquiries on the preordering
7		interface?
8	A.	No, I did not.
9	Q.	For purposes of your testimony here today did you
10		do any comparison to the average response time of
11		USN and their inquiries on the preordering
12		interface as opposed to the average response time
13		for Ameritech's service retail representatives for
14		the same preordering functions?
15	A.	No, I did not.
16	Q.	In assessing whether the access is being provided
17		by Ameritech on a nondiscriminatory basis, do you
18		believe such an analysis would be appropriate to
19		conduct?
20	A.	Since these interfaces are based on the access to
21		the back-end systems in providing data, we built
22		the interfaces based on performance criteria, not
23		based on comparing it to the retail. The
24		objective was to be able to provide the CLEC with
25		the ability to service their customers in the same

1   method that Ameritech services theirs.

2   So if Ameritech service reps can do it

3   on line without delay, then CLECs should be able

4   to do it without delay. Ameritech systems

5   sometimes are slow and sometimes are fast. So we

6   built a system based on the ability that we would

7   provide a performance level to the CLEC that would

8   be consistent regardless of back-end systems.

9   Q.   Now, if you determine that CLECs were actually

10   experiencing delays in accessing customer service

11   records, would that be a concern for you?

12   A.   Yes, it would.

13   Q.   If you determined that there were problems in the

14   system as it relates to inserting customer service

15   records into the MORTEL system for delivery to

16   CLECs, would that be a concern to you?

17   A.   Yes, it would.

18   Q.   Did you do any inquiries in connection with your

19   testimony here today to determine if there were

20   any problems in connection with inserting CSRs

21   into the MORTEL system?

22   A.   Well, Counsel, on Monday during the deposition you

23   provided some information on that. We've -- my

24   level of responsibility is such that when there

25   are serious problems with the system, some

1 systems, some incidents that would impair the

2 customers, I get involved. But the day-to-day

3 operation, day-to-day troubles I am not. But you

4 did provide some on Monday, but those would not be

5 of concern to me. There were small numbers, they

6 did not create the order, they did not cause the

7 orders in that process, they just cause it not to

8 be able to insert it at that time.

9 Q. Let me hand you, Mr. Rogers, what I will mark as

10 Exhibit No. 4. And again, this was a document

11 that was used at the deposition, so it has a

12 previous mark on it which I would ask all parties

13 to eradicate pursuant to the Judge's prior

14 ruling.

15   (Exhibit 4 marked.)

16   MS. MARSH: For the record Exhibit No. 4

17 is entitled AIIS testing problem log. It is

18 multiple pages in length, and it is a document

19 that was produced by Ameritech-Wisconsin in

20 response to certain staff inquiries.

21 BY MS. MARSH:

22 Q. Mr. Rogers, do you recognize that as a document

23 that we discussed at the deposition on Monday?

24 A. Yes, I do.

25 Q. Can you identify that document for the panel?

1	A. It's as you depicted it, a testing log that was
2	done with the preordering interface. And it is
3	multiple, looks like multiple copies of the same
4	log. Three or four copies of it in here.
5	Q. In connection with your preparation of the
6	testimony that you provided to this commission,
7	did you review this log?
8	A. No, I did not.
9	Q. Are you familiar with the problems that are
10	itemized on it?
11	A. The individual problems, no, I'm not.
12	Q. Can you tell us whether any of these problems
13	caused any delays or affected any of the
14	processing of orders from CLECs?
15	A. They did not. These were testing, internal
16	testing.
17	Q. I'm sorry?
18	A. These were internal testing, so, no, they did not.
19	Q. Can you tell us why, if you look on the last page
20	of this exhibit, can you tell us why a number of
21	these problems are still indicated as open and
22	that there is a blank in the status column?
23	MR. DAWSON: I wonder if it would be
24	helpful, Ms. Marsh, for the witness to identify
25	the date this particular piece of paper was

1   prepared. You said they're still shown as open.

2   I think the exhibit stops recording as of February

3   13th. It is already a month-and-a-half old.

4   THE WITNESS: Counsel, I don't know the

5   status of these individual troubles that are on

6   here, no. Looks like the fax date on it was the

7   17th and the last entry was the 13th, so I'm not

8   sure what the status of these are.

9   BY MS. MARSH:

10   Q.   So as to the items where the status is not

11   indicated, can you tell us as you sit here today

12   whether they are open items or whether they are

13   closed items?

14   A.   No, I cannot.

15   Q.   Can you turn to the second to the last page of the

16   exhibit, and if you could look at problem No. 54.

17   Can you tell me as you sit here today whether that

18   is an open item or a closed item?

19   A.   I can only base it on this log, Counsel. No, I

20   can't.

21   Q.   The way I read this log that suggests that that is

22   a problem with an inquiry for a due date; is that

23   correct?

24   A.   That is correct.

25   Q.   And as I read this log, it indicates that a person

```
 1        requesting a due date would be unable to retrieve

 2        one for any inquiry that requested a date where

 3        the address contained an apartment number; is that

 4        correct?

 5    A.  That's what it says, yes.

 6    Q.  If AT&T attempted today to request a due date for

 7        a customer that lived in an apartment and their

 8        apartment number was on the order, according to

 9        this log they would be unable to retrieve one; is

10        that correct?

11    A.  Counsel, according to this log as of February 13th

12        they may not have been able.  I'm not even sure if

13        this log was updated at that date, whether or not

14        when it was submitted whether it was completed or

15        correct.

16    Q.  Can you tell me as you sit here today if you know

17        whether AT&T would be able to successfully

18        retrieve a due date for a customer who had an

19        apartment number on the order form?

20    A.  I cannot definitely say that, no.

21    Q.  Now, as I read this, that problem occurred on

22        1/24/97; is that correct?

23    A.  That is correct.

24    Q.  And the date that this document apparently was run

25        is 2/14/97; is that correct?
```

1   A.   That is correct.

2   Q.   So is it fair to assume Ameritech was unable to

3   address that problem between 1/24 and the run date

4   of this document, 2/14?

5   A.   I'm not sure, Counsel. I'm not sure. If they

6   were -- people were diligent in keeping this

7   document up to date, that would be the case, yes.

8   Q.   Do you in preparing your testimony today in

9   drawing your conclusions that the preordering

10   interface is operationally ready, did you discuss

11   this type of matter with persons under your

12   supervision?

13   A.   I discussed the overall are there any problems

14   with the system that would cause a CLEC to not be

15   able to get due dates, and I was told no.

16   Q.   Did you ask the persons under your supervision to

17   provide you with a list of all testing problems

18   that had occurred during Ameritech's testing of

19   the system?

20   A.   No, I did not.

21   Q.   Did you specifically inquire as to the status of

22   any testing problems that had occurred while

23   Ameritech was testing the system?

24   A.   Not specifically. I asked as to the nature of how

25   many open issues we still have with either testing

1   or with end-use of the interfaces. And I was told

2   that there were a handful.

3 Q. Now as I understand it Ameritech did a

4   demonstration of its preordering interface; is

5   that correct?

6 A. Yes, it is.

7 Q. Can you tell me how many transactions were

8   demonstrated at that time?

9 A. Which demonstration are you referring to?

10 Q. How many demonstrations has Ameritech done?

11 A. Several. We've done them for CLECs, we've done

12   them for AT&T, we've done them for Sprint, MCI,

13   we've done a public one in January.

14 Q. How many public demonstrations has Ameritech

15   completed?

16 A. I'm not sure the number, I'm really not.

17 Q. You referred to at least one in January?

18 A. Yes.

19 Q. Sitting here today can you recall any others?

20 A. Depends what's the definition of public.

21   Nonindustry people, I would say none besides that

22   one.

23 Q. At that public demonstration in January can you

24   tell me which preordering functions were

25   demonstrated?

1   A.   The telephone number selection and the due date

2   selection. Telephone selection and customer

3   service record.

4   Q.   Which CLEC participated in that demonstration with

5   Ameritech?

6   A.   USN Communications.

7   Q.   And how many telephone number selection

8   transactions were demonstrated?

9   A.   During the course of demonstration, one.

10   Q.   And as I understand your testimony here today, USN

11   is not currently relying on the telephone number

12   selection interface for purposes of processing its

13   transactions?

14   A.   That is correct.

15   Q.   Whose decision was it to decide to demonstrate the

16   telephone number selection function?

17   A.   They tested all the interfaces, but they

18   incorporated only the CSR currently into their

19   regular business flow. The decision of which of

20   the two were done by the corporate communications

21   people. They wanted to minimize it to just a few

22   demonstrations and not development of them.

23   Q.   Do you know why USN decided not to incorporate the

24   telephone number selection function on an

25   automatic basis in its business processes?